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19 COMMONWEALTH LAND TITLE INSURANCE COMPANY

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21 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

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25 **UNITED STATES DISTRICT COURT**
26 **DISTRICT OF NEVADA**

27 THE BANK OF NEW YORK MELLON FKA
28 THE BANK OF NEW YORK AS TRUSTEE
29 FOR THE CERTIFICATEHOLDERS OF THE
30 CWABS, INC., ASSET-BACKED
31 CERTIFICATES, SERIES 2005-3,

32 Plaintiff,

33 vs.

34 FIDELITY NATIONAL TITLE GROUP,
35 INC., et al.,

36 Defendants.

Case No.: 2:21-cv-00350-GMN-BNW

**STIPULATION AND PROPOSED
ORDER EXTENDING
DEFENDANT COMMONWEALTH
LAND TITLE INSURANCE
COMPANY'S TIME TO RESPOND
TO MOTION FOR REMAND [ECF
No. 9] AND MOTION FOR FEES
AND COSTS [ECF No. 10]**

(First Request)

1 Defendant Commonwealth Land Title Insurance Company (“Commonwealth”) and
2 Plaintiff The Bank of New York Mellon (“BONY”) (collectively, the “Parties”), by and through
3 their counsel of record, hereby stipulate and agree as follows:

- 4 1. On March 1, 2021, BONY filed its Complaint in the Eighth Judicial District Court,
5 Case No. A-21-830292-C [ECF No. 1-1];
- 6 2. On March 1, 2021, Commonwealth filed a Petition for Removal to this Court [ECF
7 No. 1];
- 8 3. On March 31, 2021, BONY filed a Motion for Remand [ECF No. 9] and Motion for
9 Costs and Fees [ECF No. 10];
- 10 4. Commonwealth’s deadline to respond to BONY’s Motion for Remand and Motion for
11 Costs and Fees is April 14, 2021;
- 12 5. Commonwealth’s counsel is requesting an extension until May 6, 2021, to file its
13 response to the pending Motion for Remand and Motion for Costs and Fees;
- 14 6. Commonwealth requests a brief extension of time to respond to the Motion for
15 Remand and Motion for Costs and Fees to afford it additional time to respond to the
16 legal arguments set forth in BONY’s motions;
- 17 7. BONY does not oppose the requested extension;
- 18 8. This is the first request for an extension which is made in good faith and not for
19 purposes of delay;

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1 **IT IS SO STIPULATED** that Commonwealth's deadline to respond to BONY's Motion
2 for Remand [ECF No. 9] and Motion for Costs and Fees [ECF No. 10] is hereby extended through
3 and including May 6, 2021.

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5 Dated: April 9, 2021

EARLY SULLIVAN WRIGHT
GIZER & McRAE LLP

6
7 By: /s/-- Sophia S. Lau
8 SCOTT E. GIZER
9 SOPHIA S. LAU
Attorneys for Defendant COMMONWEALTH
LAND TITLE INSURANCE COMPANY

10 Dated: April 9, 2021

SINCLAIR BRAUN LLP

11 By: /s/-Kevin S. Sinclair
12 KEVIN S. SINCLAIR
13 Attorneys for Defendant COMMONEALTH
TITLE INSURANCE COMPANY

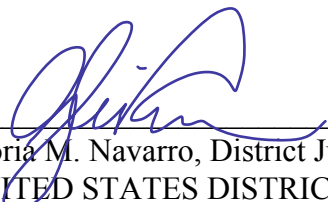
14 Dated: April 9, 2021

WRIGHT FINLAY & ZAK, LLP

15 By: /s/-Lindsay D. Robbins
16 LINDSAY D. ROBBINS
17 Attorneys for Plaintiff THE BANK OF NEW
18 YORK MELLON

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20 **IT IS SO ORDERED.**

21 Dated this 12 day of April, 2021.

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23 
24 Gloria M. Navarro, District Judge
25 UNITED STATES DISTRICT COURT
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CERTIFICATE OF SERVICE

I hereby certify that on April 9, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the Electronic Service List for this Case.

I declare under penalty of perjury under the laws of the United State of America that the foregoing is true and correct.

/s/ D'Metria Bolden

D'METRIA BOLDEN

An Employee of EARLY SULLIVAN

WRIGHT GIZER & McRAE LLP

